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22903

April 11, 1979

from Mark Allan 4/11/79

Dear Harold,

Enclosed is a memo I hurriedly cooked up during Spring Break. I hope you have time to take a close look at it and would appreciate your comments.

I am now preparing my appeal brief, which will not be what I had hoped because of upcoming exam pressures. I have 5 grounds of appeal:

- ① use of a vacated order as precedent
- ② failure to allow discovery
- ③ failure of Agency to show there were no segregable portions
- ④ excessive weight given to the agency affidavit
- ⑤ failure of the court to provide the information required in Laughlin and Mead

I'll need to talk to Jim before I finish, especially on the problem of what relief to ask for.

(OVER)